

elsewhere, will therefore be restrictive. However, the car parks at existing stores are no doubt one of the main reasons people choose to drive to those destinations. Policies SD7 and SD8 set out a town centre first approach, and limiting the number and impact of cars will enhance the quality of the environment and ultimately attract more people thereby supporting the vitality and viability of town centres.

573. Policy T6I seeks to reduce parking provision when sites are redeveloped to the maximum levels proposed in the Plan, rather than being re-provided at previous levels. This could affect the decision of some businesses, including supermarkets, whether to redevelop as it could potentially affect the future economic viability of the core business. The mixed use redevelopment of supermarkets and low density retail parks is encouraged by other policies in the Plan, and such schemes could make a valuable, albeit relatively modest, contribution towards meeting housing targets. The policy provides some flexibility for the redevelopment of retail sites outside town centres which are not well served by public transport, which will allow boroughs to take viability into account where necessary. There is no justification for allowing the re-provision of existing levels of parking on town centre sites as this would prevent the creation of higher quality, attractive places and is unnecessary given their accessibility by public transport.

Conclusion

574. Subject to our recommendations, policies T1 to T6.5 and T9, the transport schemes set out in Table 10.1, and the cycle and car parking standards set out in Tables 10.2 to 10.6 are justified and consistent with national policy. They should, therefore, be effective in helping to ensure that the development proposed in the Plan is delivered in a way that achieves Good Growth.

Is policy T8 relating to aviation and development at Heathrow and other airports consistent with national policy or otherwise justified?

575. Policy T8 deals with aviation and airports in London and the wider South East. Reference is made to Heathrow and London City Airport, and also Gatwick, Stansted, Luton and Southend, the latter four being outside the Plan area. As well as setting a strategic framework for local plans and development proposals in London, it seeks to inform and influence other processes and decisions to be made by various other parties.

576. The Mayor confirmed at the examination hearing session that the policy is intended to be consistent with, but “go beyond”, the NPPF and the *Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England (June 2018)* (“ANPS”). The ANPS sets out planning policy for any airport nationally significant infrastructure project in the south east of England. In particular, the ANPS will be the primary basis for making decisions on any development consent applications for a new northwest runway at Heathrow Airport which is the Government’s preferred scheme.

577. Notwithstanding the Mayor’s further suggested changes published after the examination hearing sessions, much of policy T8 remains inconsistent with

national policy, and/or inappropriate in the context of the proper role of the Plan as a spatial development strategy that we discussed earlier in this report.

578. Parts A and B express qualified support for both the role of airports serving London and the case for additional aviation capacity in the south east of England. Whilst the statements are broadly consistent with national policy, they are essentially objectives rather than policies. A further suggested change refers to development plans and other strategies, but it is by no means clear what they are expected to do in relation to the objectives. Furthermore, the statements create uncertainty in terms of what, if any, implications they may have for development outside London including at and related to airports in the wider South East.
579. Part C states that the aviation industry should fully meet its external and environmental costs particularly in respect of noise, air quality and climate change. However, it does not specify how this objective is intended to be achieved, or what the implications are for local plans and planning decisions in London. Part C also refers to schemes being appropriately assessed, overriding public interest, and suitable alternative solutions. It is unclear whether this is intended to be a summary of the statutory environmental assessment process, or to introduce some other requirement.
580. Part D states that the Mayor will oppose the expansion of Heathrow Airport unless certain tests are met. This is fundamentally inconsistent with national policy which supports a specific expansion scheme. Furthermore, the requirement for there to be “no additional noise or air quality harm” is contrary to ANPS paragraph 2.18 which acknowledges that, whilst national targets for emissions and legal obligations on air quality will have to be met, there may be some harm. Part C goes on to require any benefits of future regulatory and technology improvement to be fairly shared with affected communities. How this is intended to be achieved is not stated, and the implications for the planning system are unclear.
581. Parts E and G deal with surface access and connectivity. In so far as they relate to Heathrow, they provide a brief summary of more detailed requirements in the ANPS. They may be relevant to other airports in London, but they do not seem to serve any specific purpose in that regard. It is not appropriate for the Plan to set out access requirements relating to airports outside London. The Plan’s strategic transport priorities, including indicative schemes, are set out elsewhere in the Plan.
582. Part F attempts to influence future decisions about air traffic movements and the use of airspace. This is outside the remit of the Plan, and appropriately dealt with by other regulatory regimes.
583. Part G advises that better use should be made of existing airport capacity. Whilst this may be a desirable objective, its spatial development implications are unclear.
584. Part I provides qualified support for development relating to general and business aviation. However, it attempts to rule out any weighing up of environmental harm with other material considerations in the context of other relevant policies, an approach which is not justified. Furthermore, the policy

also seeks to prevent “scheduled flights” being introduced at airports that do not currently offer such services. Paragraph 10.8.11 explains this in terms of significant impacts on local communities, but there is insufficient justification for such an approach.

585. Part J attempts to introduce a blanket ban on all new heliports other than for emergency services, but no substantive justification is provided. The policy also states that steps should be taken to reduce helicopters overflying London, without any indication of what the spatial development implications are or how it is intended to be implemented by boroughs or other relevant parties.

586. Due to the numerous soundness issues that are not addressed by the Mayor’s further suggested changes, we recommend that policy T8 and the reasoned justification be deleted in their entirety [**PR53**]. Consequential changes will need to be made to other parts of the Plan, including paragraph 2.1.62 regarding Opportunity Areas in the Heathrow / Elizabeth Line West growth corridor. The Mayor’s further suggested changes to paragraph 2.1.63 clarify that the indicative figures for jobs and homes in those Opportunity Areas will be reviewed in light of the airport expansion proposals which should ensure effectiveness.

587. In order that relevant local plans and development proposals support and facilitate the expansion of Heathrow Airport in accordance with national policy and policies T1 and T3, Table 10.1 should be modified to include the new northwest runway scheme. Appropriate reasoned justification should be added after paragraph 10.3.6; this should refer to the ANPS being the primary basis for making decisions on any development consent applications for that scheme [**PR47**].

588. Planning decisions relating to other development at or related to airports in London can be made in accordance with relevant statutory procedures, taking account as required of other relevant policies in the Plan and in local and neighbourhood plans as well as national policy²²⁷.

Conclusion

589. Policy T8 relating to aviation and development at Heathrow and other airports is not consistent with national policy or otherwise justified. The policy and reasoned justification should be deleted in their entirety. Table 10.1 should be modified to include the new northwest runway scheme at Heathrow.

Does Chapter 12, including policy M1 and Table 12.1, set out an effective approach to monitoring the implementation of the Plan?

590. The Mayor is required to monitor and collect information about the implementation of the Plan and matters relevant to its review, alteration or replacement²²⁸. Policy M1 refers to the use of Key Performance Indicators (“KPIs”) set out in Table 12.1 and the Annual Monitoring Report (“AMR”). The reasoned justification provides information about how the AMR, including the

²²⁷ ANPS and NPPF 2019.

²²⁸ GLA Act sections 339 and 346.